

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

ERIKA SUSAN PERDUE,
Defendant.

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No. 3:12-CR-134-L

E.C.F.

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

Defendant Erika Susan Perdue respectfully moves this Court for a continuance of the trial and associated dates in this case, and in support presents the following:

1. The Court has entered a Scheduling Order in this case setting the deadline for Motions on September 28, 2102, and trial on November 26, 2012.

2. The defense has submitted the grounds for this motion under seal due to potential scrutiny by the media, as has occurred in the past. On a prior occasion the contents of a motion filed on Defendant's behalf, which contained personal medical information, were quoted in news accounts in televised and written media. Accordingly, the Defendant believes it is in the interests of justice for the grounds to be related only to the Court and the government.

3. Should the Court grant the requested continuance, the defense agrees that any period of delay resulting therefrom, made necessary by this request for continuance, shall be excludable under 18 U.S.C. § 3161(h)(7)(A). Additionally, the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial, 18 U.S.C. § 3161(h)(7)(A).

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE – Page 1

4. Counsel spoke with Assistant United States Attorney Camille E. Sparks who stated that the government does not oppose this motion.

WHEREFORE, Defendant Perdue respectfully asks the Court to grant this Motion for Continuance.

Respectfully submitted,

/s/ Deborah Goodall

Deborah Goodall
3131 McKinney Avenue
Suite 600
Dallas, Texas 75204
214.741.4000
214.484.8434 (facsimile)
Texas Bar No. 08140950

George C Johnson, Jr
Law Office of Buck Johnson
2777 Stemmons Freeway, Suite 1300
Dallas, Texas 75207
214-623-6015
469-637-2118 (facsimile)

F. Clinton Broden
Broden & Mickelsen
2600 State Street
Dallas, Texas 75204
214-720-9552
214-720-9594 (facsimile)

Attorneys for Defendant
Erika Susan Perdue

CERTIFICATE OF CONFERENCE

I certify that I spoke with AUSA Camille Sparks about this Motion and the grounds therefor, and she expressed no objection to the Court's granting a continuance.

/s/ Deborah Goodall
DEBORAH GOODALL

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2012, I caused a copy of the foregoing Motion to be delivered to the Honorable Sam A. Lindsay, United States District Judge, Northern District of Texas; and Assistant United States Attorney Camille E. Sparks, at 1100 Commerce Street, Dallas, Texas, 75202.

/s/ Deborah Goodall
DEBORAH GOODALL